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5 Attorney for Octavio Moreno Reyna

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8 UNITED STATES DISTRICT COURT
9 SOUTHERN DISTRICT OF CALIFORNIA
10 (HONORABLE ROGER T. BENITEZ)

11 UNITED STATES OF AMERICA,) Criminal No. 08CR1636-BEN
12 Plaintiff,) Date: August 11, 2008
13 v.) Time: 2:00 p.m.
14 OCTAVIO MORENO REYNA,) NOTICE OF JOINT MOTION TO CONTINUE
15 Defendant.) MOTION HEARING
16 TO: KAREN P. HEWITT, UNITED STATES ATTORNEY, and JEFFREY D.
MOORE, ASSISTANT UNITED STATES ATTORNEY

17 PLEASE TAKE NOTICE that Defendant, Octavio Moreno Reyna, by and
18 through his Counsel, David J. Zugman, files the instant joint motion to
19 continue the motion hearing from August 11, 2008, at 2:00 p.m. to
20 September 15, 2008, at 2:00 p.m..

21 Respectfully Submitted,

22
23 Date: August 6, 2008

24 S/David J. Zugman
David J. Zugman
Attorney for Mr. Reyna
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PROOF OF SERVICE

I, the undersigned, declare that:

1. I am over eighteen (18) years of age; am a resident of the County of San Diego, State of California; and my business address is 964 Fifth Avenue, Suite 300, San Diego, California, 92101-5008.

2. I am effecting service of JOINT MOTION TO CONTINUE THE MOTION HEARING on the following parties by electronically filing the foregoing with the Clerk of the District Court using its ECF System, which electronically notifies them:

Jeffrey Moore, Assistant U.S. Attorney
Office of the U.S. Attorney
880 Front Street
San Diego, CA 92101

3. I hereby certify that I have mailed the foregoing, by United States Postal Service to the following non-EFC participants in this case:

1. N/A

to the last known address, at which place there is delivery service of mail from the United States Postal Service.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on August 6, 2008.

S/David Zugman
DAVID J. ZUGMAN

1 DAVID J. ZUGMAN
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5 Attorney for Octavio Moreno Reyna

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11 UNITED STATES OF AMERICA,)	Case No. 08CR1636-BEN
)	
12 Plaintiff,)	Date: August 11, 2008
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14 OCTAVIO MORENO REYNA,)	JOINT MOTION TO CONTINUE THE
)	MOTION HEARING
15 Defendant.)	
)	

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17 **THE PARTIES STIPULATE** to continue Mr. Reyna's motion hearing from
18 August 11, 2008, at 2:00 p.m. to September 15, 2008, at 2:00 p.m.. This
19 is the second continuance request for the motion hearing. While the
20 parties still anticipate arriving at plea agreement which will obviate
21 the need for the motion hearing, the Assistant U.S. Attorney assigned to
22 the matter is leaving the office and the matter is to be reassigned.
23 Because the reassignment will require a brief continuance of the motion
24 hearing, Counsel believes it expeditious to simply put the matter off by
25 stipulation. Mr. Reyna is in custody. The new date and time have been
26 cleared with this Court's clerk.

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IT IS SO STIPULATED:

Dated: August 6, 2008

S/David Zugman

DAVID ZUGMAN

ATTORNEY FOR MR. REYNA

Dated: August 6, 2008

S/Jeffrey Moore

JEFFREY MOORE

ASSISTANT U.S. ATTORNEY